

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | CRIMINAL NO. 03-10393-MLW |
| v. |) | VIOLATIONS: |
| |) | 18 U.S.C. § 922(a)(1)(A) |
| STEVEN VARGAS |) | Engaging in the Business |
| |) | of Dealing in Firearms |
| |) | Without a License |

SUPERSEDING INDICTMENT

COUNT ONE: (18 U.S.C. § 922(a)(1)(A) - Engaging in the
Business of Dealing in Firearms Without a License)

The Grand Jury charges that:

Between on or about October 12, 2001 and on or about
April 30, 2003, at Lowell in the District of Massachusetts,

STEVEN VARGAS,

defendant herein, not being a licensed importer, manufacturer or
dealer under the provisions of Chapter 44 of Title 18, United
States Code, did willfully engage in the business of dealing in
firearms, including: a Bryco, Model Jennings 9, 9mm semi
automatic pistol, bearing serial number 1407655; a Bryco, Model
Jennings 9, 9mm semi automatic pistol, bearing serial number
1409929; a TII (Talon Industries), .380 caliber semi automatic
pistol, bearing serial number 003759; a Lorcin, Model L25, .25
caliber semi automatic pistol, bearing serial number 268315; an
FIE, Model Titan, .25 caliber semi automatic pistol, bearing
serial number D941355; a Bryco, Model Jennings 9, 9mm semi
automatic pistol, bearing serial number 1492622;
a Smith and Wesson, Model 686, .357 caliber revolver, bearing

serial number AEK5135; a Bryco, Model Jennings 9, 9mm semi automatic pistol, bearing serial number 1417208; a Bryco, Model Jennings 9, 9mm semi automatic pistol, bearing serial number 1437484; a Bryco, Model Jennings 9, 9mm semi automatic pistol, bearing serial number 1459608; and a Phoenix Arms, Model HP22, .22 cal revolver, bearing serial number 4186783.

All in violation of Title 18, United States Code, Section 922(a)(1)(A).


SUPPLEMENTAL FACTUAL ALLEGATIONS

The grand jury further charges that:

1. The defendant, STEVEN VARGAS, possessed at least one firearm identified in Count One whose serial number had been obliterated.

2. The defendant, STEVEN VARGAS, transferred to another individual at least one firearm identified in Count One with knowledge, intent, and reason to believe that it would be used or possessed in connection with another felony offense.

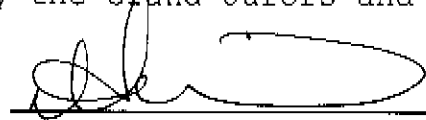
A TRUE BILL


Foreperson of the Grand Jury


James F. Lang
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS: @ 2:00pm on July 7, 2004

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk